

STATE OF OHIO                     )  
  ) SS:  
COUNTY OF SUMMIT            )

**UNITED STATES POSTAL INSPECTION SERVICE**

I, Marc Kudley, DO HEREBY DEPOSE AND SAY:

1. I am a United States Postal Inspector, employed by the U.S. Postal Inspection Service (USPIS) since May 2012. I am a sworn Federal law enforcement officer empowered to investigate criminal activity involving or relating to the U.S. Postal Service (“USPS”) and/or U.S. Mail. I am presently assigned at the USPIS Cleveland, Ohio Field Office to the Contraband Interdictions and Investigations Group, which strives to protect the U.S. Mail from dangerous drugs and illegal contraband, specifically illicit drugs and firearms. I have received training in the detection and investigation of drug trafficking. Based on my training and experience investigating drug offenses, I am aware that certain quantities of drugs indicate whether the drugs are intended for personal use or distribution. I have worked drug trafficking investigations involving the U.S. Mails since August 2012, during which time I have been involved in narcotics investigations leading to prosecution in U.S. District Court, as well as state courts.
2. This affidavit is in support of a criminal complaint against HEZEKIAH SHAKEEL JAHKE ALLEN (ALLEN).
3. Because this affidavit is submitted for the limited purpose of supporting a criminal complaint and arrest warrant, I have not included each and every fact known concerning this investigation. I have set forth only the facts I believe necessary to establish probable cause that ALLEN has committed violations of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A), that is possession with intent to distribute methamphetamine, a schedule II controlled substance.
4. I know based on training and experience that U.S. Mail is often used by narcotic traffickers to transport controlled substances. I know from my training and experience that the USPS Priority Mail system is commonly used to transport controlled substances because it provides traceability, reliability, and timely delivery. The guaranteed delivery timeframe of approximately two to three days for Priority Mail places time pressures on law enforcement agents to identify, search, and deliver these drug parcels in a timely manner.
5. On October 2, 2019, while reviewing USPS business records, I identified USPS Priority Mail parcel bearing tracking number 9505 5156 3773 9274 3502 20, addressed to Sabrina Bailey, 1306 Girard St Apt 1, Akron, OH 44301, with a return address of Vaughn Williams, 9214 S Budlong Ave, Los Angeles, CA 90044 (hereinafter “USPS parcel 9505 5156 3773 9274 3502 20”).

6. USPS parcel 9505 5156 3773 9274 3502 20 is described as a white Priority Mail Medium Flat Rate Box measuring approximately 12.5" X 3.5" X 14" in size and weighing approximately 5 pounds, 2 ounces. I identified this as a suspect drug parcel based on several characteristics, including but not limited to type of mail, origin, destination, and size.
7. USPS parcel 9505 5156 3773 9274 3502 20 was mailed from the Los Angeles, CA 90016 Post Office on October 1, 2019 and bore \$14.35 in U.S. Postage. I know California has historically been a source area for mailed controlled substances into Northern Ohio.
8. On October 3, 2019, I took custody of USPS parcel 9505 5156 3773 9274 3502 20 after it arrived at the Akron, Ohio Firestone Park Post Office from the Akron, Ohio Processing & Distribution Center.
9. I made inquiries with CLEAR, an electronic database that has proven reliable in previous investigations in determining the legitimacy of name, address, and phone number information, concerning the delivery address 1306 Girard St Apt 1, Akron, OH 44301 and was unable to associate an individual with the name Sabrina Bailey at the address. I also made inquiries with CLEAR concerning the return address of 9214 S Budlong Ave, Los Angeles, CA 90044 and was unable to associate an individual with the name Vaughn Williams at the address.
10. On October 3, 2019, certified narcotics canine "Cruiser" handled by Det. Chris Carney of the Akron Police Department (APD) gave a positive alert on USPS 9505 5156 3773 9274 3502 20. Detective Carney has been State Certified as a Narcotics Canine handler and he and narcotics canine Cruiser have worked together since 2010. Detective Carney and canine Cruiser were both certified in September of 2019 by the Ohio Peace Officers Training Academy (OPOTA) as a specialty purpose K-9 team, narcotic detection. During this time, Cruiser was trained and certified to alert to the presence of the odors from marijuana, cocaine, heroin, methamphetamine and their derivatives. Detective Carney has been trained how to handle a detector K-9 and read their alerts. According to Detective Carney, Cruiser is a reliable K-9 assist unit.
11. I know based on training and experience that individuals who regularly handle controlled substances often leave the scent of controlled substances, which narcotic canines are trained to indicate alert, on the box, contents of the box, and/or other packaging material they handle.
12. On October 3, 2019 in U.S. District Court in the Northern District of Ohio, Eastern Division, I applied for and was granted a federal search for USPS 9505 5156 3773 9274 3502 20 by the Honorable Magistrate Judge Kathleen B. Burke. The execution of the search warrant revealed approximately four pounds of an off-white crystalline substance that field tested positive for methamphetamine, a Schedule II controlled substance. The suspect methamphetamine was separated

inside four separate zip lock bags weighing approximately one pound each and concealed in vacuum sealed food saver bags and cellophane.

13. On October 10, 2019, I submitted the crystalline substance and packaging recovered from USPS parcel 9505 5156 3773 9274 3502 20 to the USPIS Forensic Laboratory for chemistry and latent print examinations.
14. On October 25, 2019, the USPIS Forensic Laboratory issued an examination report indicating USPS parcel 9505 5156 3773 9274 3502 20 contained approximately 1,776.4 grams of a crystalline substance and a sample of the material was found to contain d-methamphetamine hydrochloride. Quantitative analysis of the material was found to contain approximately 97% d-methamphetamine hydrochloride.
15. On November 18, 2019, the USPIS Forensic Laboratory issued an examination report indicating that the latent prints of HEZEKIAH SHAKEEL JAHKE ALLEN, FBI No. 835867VD3, were found on the following items:
  - A. One fingerprint on the bubble wrap packaging inside USPS parcel 9505 5156 3773 9274 3502 20
  - B. Three fingerprints on the exterior of the Priority Mail box bearing tracking number 9505 5156 3773 9274 3502 20
  - C. One fingerprint on the interior flap of the Priority Mail box bearing tracking number 9505 5156 3773 9274 3502 20
  - D. Two fingerprints on the exterior side and under tape of the Priority Mail box bearing tracking number 9505 5156 3773 9274 3502 20
16. I confirmed that the Los Angeles, California 90016 Post Office from which USPS parcel 9505 5156 3773 9274 3502 20 was mailed had surveillance cameras. I obtained copies of the video from the surveillance cameras.
17. Video from surveillance cameras inside the Los Angeles, California 90016 Post Office shows an African-American male wearing a gray hooded sweatshirt with the hood up, black pants, and white shoes with black stripes, holding the subject parcel in the lobby line and then mailing the parcel. The African-American male who mailed the parcel appears to be ALLEN based on his California and Ohio Driver's License photographs. The residence listed on ALLEN's California Driver's License is less than one half mile from the Los Angeles, California 90016 Post Office.
18. Based on the foregoing, ALLEN packaged the methamphetamine inside USPS parcel 9505 5156 3773 9274 3502 20 and then mailed it to an address in Akron, Ohio.

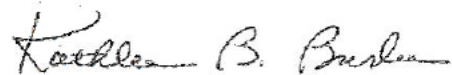
19. Based on the information contained in this affidavit, I believe there is probable cause to believe that on October 1, 2019, in the Northern District of Ohio and the Central District of California, HEZEKIAH SHAKEEL JAHKE ALLEN did knowingly and intentionally possess with intent to distribute and distribute over 50 grams of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).



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MARC KUDLEY  
U.S. POSTAL INSPECTOR

This affidavit was sworn to by the affiant, who did no more than attest to its contents pursuant to Crim. R. 4.1 (b)(2)(A), by telephone after a PDF was transmitted by email, per Crim R. 4.1 this 28th day of January, 2020.



Kathleen B. Burke, U.S. Magistrate Judge